

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

TROY ETTS and LEA ETTS,

Plaintiff,

Case No. 13-11588

Hon. Mark A. Goldsmith

v.

DEUTSCHE BANK NATIONAL TRUST
COMPANY, as Trustee for Securitized Asset
Backed Receivables LLC Trust 2004-NCI,
Pooling and Servicing Agreement Dated as of
April 1, 2004; and OCWEN LOAN SERVICING, LLC,

Defendants.

LEVEL ONE LEGAL SERVICES,
P.C.

Kelli C. Meeks (P40748)

Attorney for Plaintiffs

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HERTZ SCHRAM PC

Deborah S. Lapin (P59027)

Attorneys for Defendants Deutsche

Bank and Ocwen Loan Servicing,

LLC

1760 S. Telegraph Road, Suite 300

Bloomfield Hills, MI 48302

(248) 335-5000

**DEFENDANTS DEUTSCHE BANK NATIONAL TRUST COMPANY, AS
TRUSTEE FOR SECURITIZED ASSET BACKED RECEIVABLES LLC
TRUST 2004-NCI, POOLING AND SERVICING AGREEMENT DATED AS
OF APRIL 1, 2004 AND OCWEN LOAN SERVICING, LLC'S
EXHIBIT LIST**

Defendants Deutsche Bank National Trust Company, as Trustee for
Securitized Asset Backed Receivables, LLC Trust 2004-NCI, Pooling and
Servicing Agreement Dated as of April 1, 2004 ("Deutsche Bank") and Ocwen

Loan Servicing, LLC ("Ocwen") (collectively Deutsche Bank and Ocwen may be referred to as "Defendants"), by and through their attorneys, Hertz Schram PC, submit the following as their Exhibit List:

1. Any and all documents related to Plaintiffs' mortgage loan, including but not limited to promissory note executed on November 26, 2003, mortgage executed on November 26, 2003, Assignment of Mortgage to Deutsche Bank, 2006 Loan Modification, Loan Workout Plan, payment history and correspondence exchanged between Litton Loan Servicing, Ocwen and Plaintiffs.
2. The Sheriff's Deed on Mortgage Sale dated October 25, 2012.
3. Any documents recorded against the subject property.
4. Plaintiffs' employment records.
5. Any and all records of the Internal Revenue Service regarding Plaintiffs' payment of income taxes.
6. Any and all records of the State of Michigan regarding Plaintiffs' payment of income taxes.
7. Any and all documents identified by Plaintiffs in their Initial Disclosures and Exhibit List.
8. Any and all documents identified during the course of discovery.
9. Any and all documents marked as Exhibits at any deposition in this matter.

10. Copies of Pleadings and any Exhibits attached thereto, in possession of the parties.

11. The CV of any necessary expert witness.

12. Any documents produced in Discovery including, without limitation, documents produced in response Interrogatories, Answers, Depositions, Answers to Requests to Admit and Answers to Request for Production of Documents.

13. Defendants Deutsche Bank and Ocwen reserve the right to introduce and document which becomes known through discovery, including through trial, as discovery has not been completed.

14. Defendants Deutsche Bank and Ocwen reserve the right to amend their Exhibit List as further documents become known through the course of discovery or otherwise.

Respectfully submitted,

HERTZ SCHRAM, PC

/s/ Deborah S. Lapin

Deborah S. Lapin (P59027)

Attorneys for Defendants Deutsche Bank and
Ocwen

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Bloomfield Hills, MI 48302

(248) 335-5000

Dated: August 18, 2015

LAW OFFICES HERTZ SCHRAM PC

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2015, I electronically filed the foregoing papers with the Clerk of the Court using the ECF system, which will send notification of such filing to the following:

LEVEL ONE LEGAL SERVICES, P.C.

Kelli C. Meeks (P40748)

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/s/Deborah S. Lapin

Deborah S. Lapin